

EXHIBIT 4

Albert Villamil

From: Harold Barza
Sent: Wednesday, January 21, 2015 2:24 PM
To: Brennan, Michael M.; Boccuzzi Jr., Carmine D.; Slater, Matthew D.; Blackman, Jonathan I.; Donovan, William P.; Brown, Donald
Cc: Bruce Van Dalsem; 'Cohen, Robert'; steven.engel@dechert.com; Ian Shelton; Matt Hosen; 'OGorman, Debra'
Subject: NML v SPaceX- Request for meet and confer
Attachments: Deposition Notice to Defendant SpaceX.PDF; Plaintiff's First Request for Interrogatories To Defendant Argentina.pdf; Plaintiff's First Request for Interrogatories To Defendant SpaceX.PDF; Plaintiff's First Request for Production To Defendant Argentina.pdf; Plaintiff's First Request for Production To Defendant SpaceX.PDF

Dear Counsel,

I am writing to request a meet and confer conference with you this week concerning the above-referenced case.

As you know, we asked you to conduct a Rule 26(f) conference with us many months ago, so that discovery could commence, but you declined our request. However, we are now at a point where we feel we need to pursue discovery in support of our litigation, because the subject launch dates are getting close in time, and it will take some time to market the launch services, as we hope to do. As a result, we are planning to file a motion on Monday, January 26, asking the Court to authorize us to pursue at least some limited discovery at this time, so we may promptly file a motion for summary determination seeking an order authorizing the sale of the assets in question, as well as, possibly, the appointment of a receiver in connection therewith. Of course, if you will change your positions, and agree to at least this limited discovery, then we can simply file a stipulation to that effect, and that should obviate the need for motion practice.

To facilitate your consideration of the foregoing, I have attached to this email the discovery we will seek in the first instance. This includes Interrogatories and Requests for Productions of documents to the named defendants, and a 30(b)(6) deposition notice to SpaceX.

Can we conduct a meet and confer conference at one of the following times: 1) today at 5 or 5:30 pm pacific time; 2) tomorrow, January 22, at 10 am, 11 am, or any time between 2-5 pm (again these are pacific times) ; or 3) at 9 or 10 am, or 2 or 3 pm (pacific time) on Friday, January 23?

Please let us know as soon as possible which date(s) and time(s) will work for this meet and confer.

Thank you for your anticipated cooperation,

Sincerely yours,

Hal Barza